

MOSER LAW FIRM, PC



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December 20, 2024

**VIA ECF**

Hon. Victoria Reznik, USMJ  
United States District Court  
Southern District of New York  
300 Quarropas St.  
White Plains, NY 1001

Re: *Galvan v Rolling Lawns, Inc et al.*, Case No. 7:23-cv-06724(CS)(VR)

Dear Judge Reznik:

Please accept this status update report as directed by the Court on December 11, 2024.

**Status of Defendants' procuring an ESI vendor and the status of their ESI search.** We have obtained all text messages from the cell phones of David Ferraro and Evan Ferraro in electronic format. We also have retained a third party consultant to retrieve responsive text messages based upon the proposed additional search terms. Finally, we have also retained a contract paralegal to review the documents prior to production.

**Search in the Jobber application for responsive documents.** We have also performed our due diligence with respect to the "Jobber" software. "Jobber" is a *cloud-based* platform that can be used for various purposes, including scheduling, job tracking, and invoicing. Reports cannot be generated directly from the Jobber app. However, reports can be requested from Jobber and are available within 48 hours. On Thursday, December 19, 2024 we requested the data in CSV format from Jobber, and are awaiting a response.

**Review of redactions and production of unredacted materials to Plaintiff.** We reviewed the redactions. Yesterday, we produced unredacted versions of all documents that had been previously redacted based upon relevancy to Plaintiff's counsel.

On another note, I am still ill. In light of my continuing illness and the holidays we anticipate that the Jobber data and text messages will be produced on or before January 10, 2025.

Respectfully submitted,

*Steven J. Moser*

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CC: To all counsel of record (via ECF)